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Counsel for Castle Harlan, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NORCAST S.ÀR.L.,

Plaintiff,

: Civ. A. No.: 12 Civ 4973 (PAC)

: ECF CASE

- against -

: Electronically filed

CASTLE HARLAN, INC.

NOTICE OF MOTION

Defendant.

PLEASE TAKE NOTICE that, upon Castle Harlan, Inc.'s accompanying Memorandum of Law in Support of its Motion to Dismiss, or in the Alternative, Stay All Claims in Favor of International Arbitration, the accompanying Declaration of Timothy G. Nelson, dated July 18, 2012, and the exhibits thereto, and all prior papers and proceeding herein, defendant Castle Harlan, Inc. will move this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time designated by the Court, for an Order pursuant to Chapter II of the Federal Arbitration Act, 9 U.S.C. § 201-08: (1) compelling international arbitration pursuant to 9 U.S.C. § 206 of all of Plaintiff's claims according to the Rules of the London Court of International

Arbitation ("LCIA"); and (2) dismissing the Complaint and/or staying this action in its entirety pending the outcome of said LCIA arbitration.

Dated: July 18, 2012

New York, New York

Respectfully submitted,

Scott D. Musoff
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Elizabeth A. Hellmann
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